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12 UNITED STATES DISTRICT COURT
13 EASTERN DISTRICT OF CALIFORNIA

14 MICHELLE TIAMIYU,

15 Plaintiff,

16 v.

17 Commissioner of Social Security,

18 Defendant.
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No. 2:24-cv-02043-AC

STIPULATED MOTION AND [PROPOSED]
ORDER FOR AN EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT

20 IT IS HEREBY STIPULATED, by and between the parties through their respective
21 counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's
22 Motion for Summary Judgment be extended three (3) days from January 27, 2025 to January 30,
23 2025. This is Defendant's second request for an extension. Counsel for Plaintiff has no objection
24 to Defendant's request for an extension.

25 Good cause exists for this request. Defendant respectfully requests this additional time
26 because Counsel for Defendant has and will be unable to devote the time required to complete its
27 response. This past week Counsel has been out of the office and limited in productivity providing
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1 care for his son who has been sick at home and unable to otherwise be cared for by another party.
2 Given this situation and competing workload requirements an extension until January 30, 2025
3 will provide the opportunity for the undersigned Counsel for Defendant to prioritize completing
4 the response to Plaintiff's Motion for Summary Judgment. The undersigned Counsel apologizes
5 to the Court and Plaintiff's counsel for any inconvenience caused by this request and delay and no
6 further extensions will be required. All other dates in the Court's Scheduling Order shall be
7 extended accordingly.

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9 Respectfully submitted,

10 PHILLIP A. TALBERT
11 United States Attorney

12 DATE: January 26, 2025

13 By: s/ Oscar Gonzalez de Llano
14 OSCAR GONZALEZ DE LLANO
15 Special Assistant United States Attorney
16 Attorneys for Defendant

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18 Respectfully submitted,

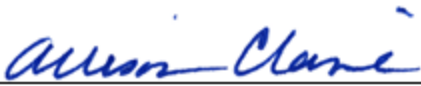
19 DATE: January 26, 2025

20 By: s/ Kevin Heitke *
21 KEVIN HEITKE, CSBN 134638
22 Summit Disability Law LLC
23 (*as authorized by email)
24 Attorney for Plaintiff
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ORDER

Pursuant to Defendant's Motion, IT IS SO ORDERED that Defendant shall have an extension, up to and including January 30, 2025, to respond to Plaintiff's Motion for Summary Judgment.

DATED: January 27, 2025



ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE